



2020 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Stamford's 5-Year Goals of the Strategic Plan for the use of HUD funds were advanced through CDBG and HOME activities carried out in PY 2020 (YR46). Unfortunately, COVID-19 continued to have an impact on programs, and many activities were not completed or significantly delayed. The City was still able to complete many of the goals established for PY 2020. The following activities were completed in the PY.

Affordable Housing: There were 281 LMI households assisted with rental rehab. The City also completed 11 rental construction units for LMI households. Rehab activities consisted of 267 LMI households assisted with energy efficiency improvements at Friendship House, 8 LMI households with rehab at the HACS Sheriden Mews and 6 LMI households at the 190 Stillwater project. There were 11 LMI households assisted with new rental construction at the Metro Green development on 695 Atlantic Street. This was a HOME project that was initially funded in 2017 and completed in the program year. HOME funds were frozen for the majority of the program year as one project didn't get the proper CO by the time the affordability period was over. A letter of extension to HUD was approved and the time was extended to August 2020.

Public Services: The City assisted 239,329 LMI persons with vital public services in the program year. The majority of these services were food bank services from the Food Bank Warehouse on Glenbrook Rd and Person to Person on Wheels with a combined 238,947 LMI person served. There were also 216 LMI seniors assisted from Elderly Prescription Services and Senior Dental Care. There were 166 LMI youth assisted with youth services from Kids in Crisis and the Garden Club Scholarships for summer camp. Finally, there were 64 LMI persons assisted with services for victims of domestic violence at Rowan Sexual Assault Crisis Counseling Services.

Homeless Prevention: The City and Pacific House assisted 444 LMI persons with mental health services which helped to prevent homelessness. The City and Inspirica assisted 40 LMI persons with shelter operations. Services at the shelter included a Woman's Housing Life Coach program, 24/7 emergency housing, counseling, case management, and other wraparound services.

Public Facilities and Infrastructure: The City assisted 781 LMI persons with improvements to public facilities and infrastructure activities. Activities included improvements to facilities for persons with a disability, homeless facilities, youth centers, and neighborhood facilities. Unfortunately, the City did not meet its goals for PY 2020, however this was mainly a result of activity accomplishment set-ups. The City anticipated to have activities that had a low/mod area benefit, however benefits were recorded by intake. The City will make adjustments in the future to capture accomplishments accordingly.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
1A Expand & Improve Public Infrastructure	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250000	0	0.00%	50000	0	0.00%
1B Improve Access to Public Facilities	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250000	781	0.03%	50000	781	1.56%
2A Increase Homeownership Opportunities	Affordable Housing	HOME	Homeowner Housing Added	Household Housing Unit	10	0	0.00%	2	0	0.00%
2A Increase Homeownership Opportunities	Affordable Housing	HOME	Direct Financial Assistance to Homebuyers	Households Assisted	15	0	0.00%	3	0	0.00%
2B Increase Affordable Rental Housing Opportunities	Affordable Housing	HOME	Rental units constructed	Household Housing Unit	10	11	110.00%	2	11	550.00%
2B Increase Affordable Rental Housing Opportunities	Affordable Housing	HOME	Rental units rehabilitated	Household Housing Unit	250	281	112.40%	50	281	562.00%

2C Provide for Owner Occupied Housing Rehab	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	250	0	0.00%	50	0	0.00%
3A Provide Supportive Services for Special Needs	Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250000	239329	95.73%	50000	239329	478.66%
3A Provide Supportive Services for Special Needs	Non-Homeless Special Needs Non-Housing Community Development	CDBG	Homeless Person Overnight Shelter	Persons Assisted	0	40		0	40	
3A Provide Supportive Services for Special Needs	Non-Homeless Special Needs Non-Housing Community Development	CDBG	Homelessness Prevention	Persons Assisted	500	444	88.8%	100	444	444.00%
4A Provide Financial Assistance New Expanding Busi	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	50	0	0.00%	10	0	0.00%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

The City's use of funds addresses the priorities and objectives in the plan and supports programs and services that benefit the most vulnerable members of our community which are the homeless, victims of domestic violence, the elderly and children of low income families. The provision of funds to benefit these populations is reflected in the priorities and activities identified in the CDBG program.

CDBG funds were used to assist with vital public services, public facilities and infrastructure improvements and affordable housing rehab. The number of persons assisted with public service activities exceeded our expected goal. Public service beneficiaries help to assist individuals and families avoid homelessness. For example, the distribution of food by the Food Bank and Person to Person on Wheels or prescription drugs by Elderly Prescription Services and Senior Dental Care may ensure a person has sufficient funds for a rent payment. Improvements to public facilities and infrastructure help to increase the quality of life of residents and affordable housing programs such as the rental rehab program help to provide decent housing for low-income households and the elderly.

HOME funds are used to create affordable housing opportunities and ensure the long-term viability of our existing stock of affordable housing. HOME funds were frozen however for the majority of the program year as one project didn't get the proper CO by the time the affordability period was over. The City however recently completed HOME projects that were funded in previous years. These activities were a new rental construction at 695 Atlantic Street and a rental rehab at 190 Stillwater Ave.

Actual Goal Accomplishments against Proposed Goal Outcomes

1A Expand & Improve Public Infrastructure: There was a goal for 50,000 LMI to be assisted, however the City did not have any public improvement activities as the focus was on public facility improvements in the program year.

1B Improve Access to Public Facilities: There was a goal for 50,000 LMI to be assisted, however this goal outcome indicator was intended for a low/mod area benefit and the City reported actual LMI persons, therefore falling short of the estimated goal. The City may revise this goal in the future to capture actual LMI persons assisted.

2A Increase Homeownership Opportunities: There were no homeownership activities in the program year. The City anticipates the HOME program

to be restarted in the upcoming program year and funding will be available again for homeownership opportunities.

2B Increase Affordable Rental Housing Opportunities: There were goals of 2 rental units to be constructed and 50 rental units rehabbed, and both these goals were exceeded.

2C Provide for Owner Occupied Housing Rehab: There were no owner-occupied rehab activities in the program year as the City focused on renter rehab. The City will work to identify eligible homeowners and report accomplishments in future upcoming reports.

3A Provide Supportive Services for Special Needs: The City had a goal of 50,000 LMI persons served with public services and 100 LM persons served with homeless prevention. The City exceeded these goals and will continue to work off the success of its partnerships with public service and homeless service providers.

4A Provide Financial Assistance New Expanding Business: Unfortunately, the City was not able to complete any economic development activities in the program year. This remains a priority and the City will continue to work towards planned activities such as microenterprise assistance in the West Side Neighborhood.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

	CDBG	HOME
White	99,600	4
Black or African American	137,585	9
Asian	211	0
American Indian or American Native	11	0
Native Hawaiian or Other Pacific Islander	1	0
Total	237,408	13
Hispanic	129,402	5
Not Hispanic	108,006	8

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

Data Note: Due to the limitations of the IDIS system reporting table, “other and multi-racial” households were not counted in the race/ethnicity table above. As a result, in the CDBG program there were 3,250 persons and for HOME there were 4 households that were “other and multi-racial” and not included in the table above. Also, the table above only represents projects that were able to collect race/ethnicity data through an application/intake process, therefore total race/ethnicity numbers may not equal total persons served reported in this CAPER.

According to the 2015-2019 ACS, the majority of the City’s residents identify racially as white 64.4% with minority races being 14.1% black, and 8.6% Asian. Some other race was 9.4% and Two or more races was 3.2% of the population. All other races made up less than 1% of the population. Ethnically, 27.2% of the population in Stamford identified as Hispanic. At this reporting, Asian persons assisted through CDBG activities were less than 1%, which is well below their population average in the City. In comparison, black persons assisted were 58% and persons who identified as Hispanic assisted was just over 54%.

The Needs Assessment in the 2020-2024 Consolidated Plan, assesses if any racial and ethnic group by income category has a disproportionate need in the area with regards to housing problems, severe housing problems and cost burden. Households with housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with severe housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as severely overcrowded homes (more than 1.5 person per room) and severe cost burden (spending 50% or more of income on housing per month).

According to the Needs Assessment, minority race groups that have a disproportionate need in housing

problems and severe housing problems are Black and Asian households. All other minority race groups have a very small number of households. Hispanic households also have a disproportionate need in housing problems at very-low incomes. For housing cost burden, Black and Hispanic households have a disproportionate need. In comparing the disproportionate needs of certain race/ethnic groups as described by the Needs Assessment to the beneficiary outcomes provided, the City has worked sufficiently to serve Black or African American and Hispanic households in CDBG programs, however there is a need to identify assistance for Asian households.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	976,993	438,263
HOME	public - federal	518,413	0

Table 3 - Resources Made Available

Narrative

During the 2020 Program Year, the City had two sources of Federal funds which were the CDBG and HOME grant programs. The table above details the resources made available as well as funds expended during the program year. There were no HOME funds drawn or expended in the program year. As discussed in the CR-05, HOME funds were frozen for the majority of the program year as one project didn't get the proper CO by the time the affordability period was over.

CDBG funds in the amount of \$976,993 was made available in the 2020 program year and \$438,263 was expended. Expended funds also included funds made available from previous years 2014, 2015 and 2016. These funds went towards public facilities improvements, vital public services and affordable housing rehab.

For HOME funds, \$418,413 was made available in the 2020 program year from HUD. Resources also included \$100,000 in program income for a total of \$518,413 of resources available, however no funds were drawn or expended. The City is planning to get the HOME program started again and is working with a consultant to move this forward.

CARES Act Funds

The City received total of \$1,779,847 from CDBG-CV1 and CDBG-CV3 allocations. The CDBG-CV grant funds activities that prevent, prepare for and respond to the coronavirus (COVID-19) pandemic. These activities include public services that assists those negatively affected by COVID-19 and administration of the program. In the 2020 program year the City expended \$550,820 in CDBG-CV funds.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Qualifying LMI Census Tracts	100	100	>51% LMI

Table 4 – Identify the geographic distribution and location of investments**Narrative**

As per the CDBG program requirements, priority for funding of activities goes to those that directly serve our low-moderate income, and/or benefit the census tracts in which they are concentrated. Exact location of CDBG funded activities are determined through the CDBG budget development process as well as Low/Mod Block Group tract data, in which providers of services/housing/community development activities bring their projects to the City requesting funding.

Low/Mod Block Group tract data provided by HUD CDBG Low Mod Income Summary Data (LMISD) indicated areas with income eligible populations. The identified census block group tracts within the jurisdiction that are considered low-moderate income can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

CDBG awards are always a small portion of the total amount of funds required for any public service project. Subrecipients use CDBG funds to leverage a variety of local sources, which may include private donations, state and other local funds. In each application, agencies detail total project cost and identify sources of funds.

Public Improvement and Housing projects typically require subrecipients to contribute some funding to complete the project.

HOME Match:

HOME awards are often a very small percentage of a much larger project; however, due to the requirement to have all secured funds in hand we are seeing more projects where HOME will be 100% of the project. The City has a recorded match from prior Federal fiscal years in excess of the required match contribution, shown in the following HOME Match table (\$9,191,772). In the case of HOME rehabilitation loans, the borrowers provide modest amounts of private capital to compete a project.

There were no HOME Match contributions in the program year. The City also did not draw or expend any HOME funds in the program year, therefore there was no HOME match liability.

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	9,191,772
2. Match contributed during current Federal fiscal year	0
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	9,191,772
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	9,191,772

Table 5 – Fiscal Year Summary - HOME Match Report

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match

Table 6 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at begin-ning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
101,252.50	0	0	0	101,252.50

Table 7 – Program Income

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number	6	0	0	0	0	6
Dollar Amount	\$339,218	0	0	0	0	\$339,218
Sub-Contracts						
Number						
Dollar Amount						
	Total	Women Business Enterprises	Male			
Contracts						
Number	6	0	6			
Dollar Amount	\$339,218	0	\$339,218			
Sub-Contracts						
Number						
Dollar Amount						

Table 8 - Minority Business and Women Business Enterprises

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number						
Dollar Amount						

Table 9 – Minority Owners of Rental Property

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired						
Businesses Displaced						
Nonprofit Organizations Displaced						
Households Temporarily Relocated, not Displaced						
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number						
Cost						

Table 10 – Relocation and Real Property Acquisition

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	107	292
Number of Special-Needs households to be provided affordable housing units	0	0
Total	107	292

Table 11 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	7	11
Number of households supported through Rehab of Existing Units	100	281
Number of households supported through Acquisition of Existing Units	0	0
Total	107	292

Table 12 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

The City exceeded its goals for assisting LMI households with affordable housing assistance through rental housing rehab and new rental housing construction.

Through the CDBG rental rehab program, the City assisted 275 low- and moderate-income (LMI) households with rental housing rehab activities. These rental rehab activities consisted of 267 LMI households assisted with energy efficiency improvements at Friendship House, 8 LMI households with rehab at the HACS Sheriden Mews. In the HOME program there were a total of 17 LMI households assisted. There were 6 LMI households at the 190 Stillwater project assisted with rental rehab and there were 11 LMI households assisted with new rental construction at the Metro Green development. These completed HOME activities were funded from previous year funds and were completed in the 2020

program year.

Discuss how these outcomes will impact future annual action plans.

While the City exceeded its established goals for affordable housing assistance in the program year, all the accomplishments were made through rental housing rehab and new construction of rental housing. The City is working to start affordable housing programs for owner-occupied households, and this will be a focus in upcoming program years.

CHDO projects continue to be a challenge. The City will need to review the \$20,000 per unit limit for projects. Work is currently being planned with CHDO and NNI with rental rehab activities and the City anticipates to report these accomplishments in future CAPERS.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	8	0
Low-income	267	13
Moderate-income	0	4
Total	275	17

Table 13 – Number of Households Served

Narrative Information

Through the CDBG rental rehab program, the City assisted 275 LMI households with rental housing rehab activities. Reporting by income, the households served were 8 extremely low-income and 267 low-income households.

In the HOME program 6 LMI households at the 190 Stillwater project were assisted with rental rehab and there were 11 LMI households assisted with new rental construction at the Metro Green development. These completed HOME activities were funded from previous year funds and were completed in the 2020 program year. Reporting by income, all 11 households at the new construction were low-income. For the HOME rehab program, 2 were low-income and 4 were moderate-income.

Those with worst case needs are individuals or households at-risk of or experiencing homelessness and/or are extremely low-income. The City will continue to prioritize and work with partners that assist these groups. In the program year, 8 extremely low-income households were assisted with rental rehab activities to maintain the condition of their housing. Households with extremely low-incomes lack the funds to properly upkeep their homes which may promote unsafe conditions and contribute to situations that lead to homelessness.

The City did not specifically report any persons with a disability in affordable housing programs, however if a household with a disability is identified for assistance in one of the housing programs, the City will make all necessary accommodations within reason to meet the needs of the household.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Stamford participates in the local Continuum of Care, Opening Doors Fairfield County (ODFC), to assist persons experiencing homelessness. As projects are presented to the City by CoC members, City representatives attempt to coordinate assistance as feasible from existing resources, which include Federal HUD funds. For example, funds were provided to Pacific House, Inc. for a drop in program serving persons at-risk of or experiencing homelessness. The City also assisted Pacific House with its kitchen improvements. The City also uses CDBG funds to assist Inspirica's Women's Housing Program which provides emergency support services.

The City supports the specialists in homelessness, (Inspirica, Inc., Pacific House, Inc., ODFC) in their efforts to conduct annual homeless counts, and especially to establish a "one point" universal intake for the homeless, which would assess needs and begin the shelter and counselor/resource referral process. Funds were also provided to support public services such as the mental health needs of homeless youth.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City works closely with Stamford's shelters to assure their buildings are maintained and improved to meet the needs of the sheltered, and that transitional housing opportunities are available. In PY 2020 funds were allocated to Pacific House to help with its kitchen improvements that included new appliances and equipment. The facility provides emergency food, shelter and case management services for homeless individuals and assists with finding and transitioning individuals and families experiencing homelessness to permanent housing. At Inspirica, a Woman's Housing Life Coach helps homeless women at the shelter to transition into more permanent housing. At the shelter, these services include case management, employment training, housing placement other supportive services.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City continues to make it a priority to help LMI individuals and families to avoid becoming homeless, especially those who are likely to become discharged from systems of care and are most at-risk of

returning to homelessness. The City has assisted in the creation and rehab of transitional housing units critical to offering a stable housing opportunity to those who are homeless while providing counseling for development of skills necessary to obtain permanent housing and maintain continued occupancy of that housing. The City has also accepted and supported applications by the Continuum of Care members for funding.

Through the HOME program and Zoning, the City has created Below Market Rate housing which provides options for an individual or family seeking permanent housing in a high cost housing market.

The CDBG program funds public services such as counseling programs which work with those in danger of homelessness and the homeless in finding suitable housing alternatives. Inspirica's Women's Housing Program provides emergency support services which are intended to help clients avoid homelessness. Kids in Crisis is a funded program that addresses the mental health of youth that may be at-risk of homelessness. CDBG also funded programs which offered access to food banks and medical prescription and dental services freeing up funds for rent.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

In a high housing cost area, households and individuals facing a loss of income still need to "make the rent." The services funded through CDBG, like the Food Bank and Senior Prescription Drug Program, assist these families in stretching their resources. There is also the need to increase or maintain the number of affordable units, which is done with HOME participation in the creation and preservation of affordable housing units. Acquiring and keeping employment is addressed through personal counseling and job skills training at our shelter facilities. City funded programs include employment training for persons transitioning out of homelessness and is provided by Inspirica Women's Life Coach. These services include case management, employment training, housing placement other supportive services.

For those impacted by domestic violence, counseling and emergency assistance is provided by the Rowan Sexual Assault Crisis Counseling Services. Agreements between service providers and the Correction/Court facility result in Shelters being informed of institutional discharge so that people don't just "hit the street."

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City continues to work with the local housing authority Charter Oaks Communities (HACS) for the completion of rehab projects for its low-income housing developments. Assistance was provided to the housing authority for window replacement, handicap access as well as rehab of 8 units.

Charter Oak Communities receives federal funds from HUD and maintains its own staff. Charter Oak Communities has an ambitious plan to undertake initiatives in areas such as public housing revitalization, communal urban agriculture, early childhood education, job/small business development, infrastructure improvements, community building and improved access to health care in partnership with Family Centers, the Boys & Girls Club, Stamford Hospital, the West Side Neighborhood Revitalization Zone, Fairgate Farm, the City of Stamford, Optimus and Community Health Centers. Many of these programs target the Vita Health and Wellness District 9West Side/Census Tracts 214 and 215.

Actions taken to encourage public housing residents to become more involved in management and participate in homeownership

Charter Oak Communities continues to address the need for tenants to increase income through education, counseling and job training. The PHA with its ongoing efforts, continue to assure that tenants participate in a housing self-sufficiency program and to focus on household based economic development.

Beginning with its 2000 HOPE VI grant, Charter Oak Communities has provided avenues for tenants to transition to home ownership. This has continued through redevelopment of the Fairfield Court units to Fairgate. Charter Oak Communities established building councils for each of its developments. These councils review proposed funding of projects that impact their buildings. They were vital in several building renovation projects which involved temporary and permanent relocation of tenants. Now these councils are used as sounding boards for the development of requests for uses of PHA capital funds and refinancing. Charter Oak Communities will seek to develop a plan to create an endowment for supportive service programs administered within the various affordable housing programs. Resident-led initiatives including public housing resident-to-resident community service programs have and will continue to engage residents in activities which improve the quality of life for all residents. Residents become "stakeholders" and participate in public housing revitalization, from planning through operations which strengthens the growth and development of the community.

Actions taken to provide assistance to troubled PHAs

Charter Oak Communities is not designated as a "troubled PHA."

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City is committed to affirmatively furthering fair housing, including making referrals to counseling agencies to ensure that applicants for assistance will be successful in obtaining conventional loans. The City works with Realtors and banks to stress the need to provide fair and equal access to conventional financing. The City also works with LIHTC projects that by definition provide housing to very low-income persons.

The City is reviewing the Inclusionary Housing Zoning regulation to encourage the creation of housing accessible to individuals and families at a lower income level. In past years, the Housing, Community Development and Social Service Committee of the Board of Representatives held a number of meetings to review the Inclusionary Housing Zoning regulation. The City continues to provide tax abatement for affordable housing developments.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The main obstacle to meeting underserved needs is the continued reduction of available funds. The Community Development Office funds programs that target the most vulnerable populations which have underserved needs. Community Development also provides information about funding opportunities to local community agencies to help them secure other public and private sources of funds. Funded programs include services for persons with a disability, the elderly, the homeless and victims of domestic violence.

The City provides housing rehab for LMI households in need of housing repairs. City has an "open, rolling" application for this type of assistance. The maximum available per unit is \$20,000, however, repairs in these units often exceed the amount of HOME funds available, or more commonly the value of the property exceeds the maximum HOME property value.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The City of Stamford has a great need for housing rehabilitation. The housing stock in the City is relatively old and as the housing units age there is an increasing need for rehabilitation to maintain a safe and secure housing stock. It is particularly important to assist low-income households that live in older homes.

City programs are enhanced by the services available through its own municipal departments and via its linkages with various community agencies and programs. Using a coordinated system reciprocal referrals and information sharing with Building, Fire, Social Services and Zoning/Land-use, Stamford has built a

community network able to address housing related needs. The City's Department of Health include services such as prenatal and well child care, school and public health nursing, and the Women, Infant, and Children (WIC) nutrition program. As part of the child case management the Environmental Health & Inspections Division confers with pediatricians, clinics and human service agencies to track the progress of each child with lead poisoning.

The City of Stamford Department of Health has knowledgeable staff that can assist with any questions regarding lead. The Department of Health has a Laboratory Division that provides finger screening on select weekdays. The Department of Health is also responsible for investigating cases of lead poisoned children six years of age and younger with lead levels 10ug/dl or greater. The investigation entails an interview with the family, visual inspection of the premises, and paint chip, soil, and/or dust samples obtained for analysis. If the results indicate lead is present in the home, the owner will be responsible for abating the lead using a certified lead abatement contractor to remove the lead to assure proper removal and clean-up. The Department of Health sends a reminder test letter to parents/guardians for capillary results 5-9 µg/ dl. The level of concern has now been lowered from 10 µg/dl to 5 µg/dl. The new protocol went into effect on July 1, 2013. Any CDBG and HOME funded projects (residential) in pre-1978 structures are tested for lead-based paint hazards. If lead is present the sub-recipient must ensure that lead is abated in accordance with the regulations of the Environmental Protection Agency and in compliance with the Residential Lead Based Paint Hazard Reduction Act of 1992 (Title X) and subsequent changes.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The activities identified in this CAPER report worked directly to reduce the poverty-level for families in Stamford. For example, Pacific House, Inc. was funded to assist poverty-level individuals acquire the skills they need to expand their employment opportunities. Inspirica was funded to offer families access to programs to develop skills to rise from poverty. Continued counseling and training of those with low income who reside in Charter Oak Communities associated developments will assist these families in increasing their income.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The City worked with local non-profit and other public agencies to implement the community development plan. The City evaluated each activity, and the agencies and organizations, to assess the strengths and gaps in the service delivery system. The City works with ODFC (CoC), Pacific House and Inspirica to achieve a single point of entry into the homeless referral system. The Community Development Office communicates with the Social Services Department and Health Department and funding recommendations are reviewed by the Housing, Social Services, Community Development Committee of the Board of Representatives (HCD/SS) and the City Board of Representatives. The HCD/SS Committee held a number of meetings as to discuss housing and community development needs and how the programs can address these needs.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

Each year the City funds community services providers that meet the highest needs identified in the City of Stamford. The City's Community Development Office is engaged with funded subrecipients and not only monitors progress of the program but also provides technical assistance when needed.

As the emphasis on housing the homeless has increased, there has been a natural growth of cooperation between public and private operators of affordable housing to create workable support/counseling for those obtaining transitional and permanent housing. The City supports these efforts, and urges those with newly funded HOME projects to consider establishing relationships with homeless service providers such as Inspirica and Laurel House to assist households to become successful in their new housing. Charter Oak Communities has a vibrant partnership with Family Centers, Inc. to connect residents with social services. The City will continue to work with Charter Oak Communities on the Vita Health and Wellness district.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City has identified impediments to fair housing choice, including affordable housing, and has also identified actions to take to overcome the effects of these impediments. They are listed below:

Affordability

The greatest barrier to affordable housing in Stamford is lack of supply. Market forces have increased property values and rents; private units are upgraded and rented at higher amounts, and sites are difficult to find for new affordable construction as land prices make projects financially infeasible. As possible, the City, through its housing capital funds, assists non-profits with site assembly.

Actions Taken: There were 11 LMI households assisted with new rental construction at the Metro Green development on 695 Atlantic Street. The City also has a housing rehab program which helps to maintain housing conditions for LMI households. LMI households have difficulty affording the costs of housing rehab, and this assistance will help housing units from falling into conditions that may lead to homelessness.

Access

In single family home ownership, an analysis of 2015 HMDA data for the Bridgeport-Stamford-Norwalk MSA (Conventional Loans, 1-4 Family, purchase, owner occupied less than or equal to \$314,000) shows the percent of applicants and percent of loans made are relatively proportional. For example,

approximately 10% of the applicants were Hispanic and approximately 10% of the loans originated were to Hispanic consumers. Approximately 30% of the applicants were non-white and 20% of the loans originated were to non-white borrowers. Stamford's down payment program helps provide access to capital and increases buyer purchasing power. Applicants receive home buyer training, and assistance through the application/purchasing/financing process from housing counselors who assure equitable treatment. In combination with units created through the inclusionary and linkage programs, the City has developed a means of increasing opportunities for segments of the population that may otherwise be impacted by discriminatory practices.

Actions Taken: The City is committed to affirmatively furthering fair housing, including making referrals to counseling agencies to ensure that applicants for assistance will also be successful in obtaining conventional loans. The City is willing to engage Realtors and banks to stress the need to provide fair and equal access to conventional financing. Unfortunately, the City didn't assist any LMI households with down payment assistance in the program year, however in upcoming program years the City anticipates the program to continue. Applicants will be provided information on fair housing and assisted with housing purchases.

The City has an Affirmative Marketing Policy and Procedures statement. There are three sections to the policy: General Information on Fair Housing and Affirmative Marketing Policies, Notices for Targeted Properties, and Special Outreach. The policy was developed to assure that participating landlords, organizations and individuals realize that the City adheres to Federal Fair Housing requirements, and has an affirmative marketing procedure in place.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

CDBG Monitoring: The City of Stamford Community Development (SCD) staff review the Independent Audits for all subrecipients at the time of application and immediately prior to entering into a contract. SCD staff meet with public service and economic development subgrantees' staff both on-and off-site as needed to review program procedures and accomplishments, and assure accuracy in reporting and timeliness in expenditures. Housing and public improvement activities were monitored on-site. Agencies targeted are those who have recently changed staff and/or must design their own CDBG compliant intake-service client monitoring, for example, economic development recipients. SCD staff meet with agency staff to provide technical assistance. When an agency is selected, their review includes: Adherence to implementation of scope of service in accordance with the executed agreement; Review of unduplicated clients income and race/ethnicity and intake form providing data; Review of performance measurements; Documentation of request for payments; Record keeping – file retention, availability and accessibility of data. Site visits include interviews with staff and review of service files to assure compliance with low-moderate income benefit requirements and contracting/accounting procedures. No findings were issued in PY 2020. Remote monitoring is performed for each Subrecipient Activity Report or Request for Payment. All work related to construction progress payments is inspected by SCD staff and/or City inspectors. SCD staff conduct on-site interviews of workers subject to Davis Bacon wage rates, and conduct desk reviews of certified payroll reports.

HOME Monitoring: A HOME program monitoring log lists all properties, site contacts, date of last inspection and next required date of inspection. SCD uses the City Building/Health departments to complete inspections. Tenant records are reviewed for projects in the affordability period. Tenancy reports are due by March 1st; a reminder letter is sent with new HUD income levels and rents. All HOME units reporting are compliant. City staff follows up with non-reporting landlords. Administrative site visits are made to assure compliance. The SCD staff uses a combination of on- and off-site monitoring mechanisms. SCD requires documentation for all requests for payment prior to release of funds. SCD staff reviews and approves every request for payment. All work related to construction progress payments are signed off by a project architect and/or City inspector. The site is visited by an SCD staff member, who photographs projects. SCD conducts on-site interviews of workers subject to Davis Bacon wage rates, and conducts desk reviews of certified payroll reports.

For HOME down payment loans income and property eligibility are reviewed. Before closing, the Health Dept. inspects for code violations and buyers must address any deficiencies. Newly constructed units must have the City Certificate of Occupancy. Continued occupancy is monitored as part of the mortgage portfolio maintenance process. For example, any notification of payoff, or lis pendens, is used to target the property for additional tenancy evaluation.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The City adheres to its HUD approved Citizen Participation Plan to guide its citizen participation process in the development of plans and performance reports for its CDBG and HOME program. At least two public hearings are held throughout the year to discuss housing and community needs and priorities, the proposed strategies in the AAP, affirmatively furthering fair housing and a review of program performance. These hearings are held early in the program year to help guide the development process of each AAP. In the program year, a public hearing was held on January 27, 2020 to discuss community needs, CDBG & HOME program performance, eligible activities and uses of funds and proposals for the program year. A second hearing was held on July 15, 2020 to review and discuss the activities proposed in the 2020-2024 Consolidated Plan and first year 2020 AAP.

To comply with 24 CFR 91.105 (d)(1) the City held a 15-day public comment period to receive comments from the public on the draft 2020 CAPER. **The Comment Period ran from September 10, 2021 until September 24, 2021.** The draft CAPER was available electronically on the City's website at (<http://www.stamfordct.gov/community-development-office>) and for review in hard copy at the Community Development office at Stamford Government Center, 888 Washington Blvd., Stamford, CT 06904-2152. Comments could be returned to ATTN: Community Development Office at the address above.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

This PY 2020 CAPER reports on the first year of the 5-Year 2020-2024 Consolidated Plan and there are no changes to the overall strategies of the Strategic Plan. The priority needs and goals continue to serve as the basis of the 5-Year Strategic Plan. While the needs and goals remain the same, the City may make adjustments to the goal outcome indicators as necessary to properly account for any changes to planned activities and funding priorities during the development of each AAP in the 5-Year planning period. As indicated earlier in the CAPER report, the City may revise public improvement goal outcomes from low/mod area benefits (LMA) to the actual number of LMI persons estimated to benefit from the activity (LMC).

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/A

CR-50 - HOME 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

In PY 2020 there were no on-site inspections. Due to the circumstances presented by COVID-19, HUD waived ongoing periodic inspections of HOME assisted rental housing that are under the period of affordability. As well, a waiver was applied towards waiving annual HQS inspections of TBRA units to protect both inspectors and TBRA tenants.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)

The City of Stamford's office of Community Development, has an Affirmative Marketing Policy and Procedures statement. There are three sections to the policy: General Information on Fair Housing and Affirmative Marketing Policies, Notices for Targeted Properties, and Special Outreach. The policy was developed to assure that participating landlords, organizations and individuals realize that the City adheres to Federal Fair Housing requirements, and has an affirmative marketing procedure in place. When the City is notified of vacancies, effort is made to assure that individuals who normally might not apply for the vacant rehabilitated units because of their race or ethnicity:

- Are aware of the vacancies
- Feel welcome to apply
- Have the opportunity to rent the units.

The City has established an e-mail listing of agencies which are contacted when a unit becomes available. This listing includes Hispanic, Black and Haitian outreach agencies.

HOME outreach efforts to minority/women developers, investors and companies are consistent with the Minority Outreach Statement presented in the Action Plan's Institutional Structure, in which actions are described to develop and improve the institutional structure impacting housing development and availability. The principal means of minority and/or women/disadvantaged business involvement in the HOME program are as Property owner/developer and Construction related contractor. In PY 2020 however there were no minority or women owned businesses contracted in through the HOME program.

The City of Stamford believes its current affirmative actions in noticing of development opportunities and affordable housing assistance under the HOME programs is adequate. The current "use" of these opportunities indicates effective affirmative action.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

According to the PR-09, the City had a total of \$101,252.50 in HOME program income at the start of PY 2020. The City did not expend any program income for the HOME program in the program year and the balance remains at \$101,252.50.

Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)

The City continues to promote the "Below Market Rate" Inclusionary Housing Zoning Program. The Below Market Rate (BMR) program is an initiative of the City of Stamford to achieve a diverse and balanced community with housing available for households of all income levels. Economic diversity fosters social and environmental conditions that protect and enhance the social fabric of the City and are beneficial to the health, safety and welfare of its residents and to the environmental quality and economy of the region. Tenants seeking a BMR unit should contact the development leasing office of the property they are interested in for information and/or to determine the status of a waiting list. Contact information for each building participating in the program can be found on the City's website at:

<https://www.stamfordct.gov/government/operations/land-use-bureau-planning-zoning-zoning-enforcement/community-development/below-market-rate-dwelling-units>